

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

LAFACE RECORDS LLC, a Delaware limited liability company; UMG RECORDINGS, INC., a Delaware corporation; and BMG MUSIC, a New York general partnership,

Plaintiffs,

VS.

TANACCA BREWER,

Defendant.

Case No. 08 C 00480

Honorable Philip G. Reinhard

Magistrate Judge P. Michael Mahoney

MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION

Plaintiffs Laface Records LLC; UMG Recordings, Inc.; and BMG Music (collectively, the “Plaintiffs”), by and through their undersigned attorneys, and pursuant to Rule 55 of the Federal Rules of Civil Procedure, hereby move for the entry of default judgment and a permanent injunction against Defendant Tanacca Brewer (“Defendant”).¹ In support thereof, Plaintiffs respectfully state as follows:

1. On January 22, 2008, Plaintiffs filed their Complaint for Copyright Infringement (the “Complaint”) against Defendant.
2. On May 16, 2008, Defendant was served with a Summons to appear in the above-captioned proceeding. As such, Defendant’s responsive pleading was due on or before June 5, 2008.
3. Defendant has not appeared in this action and has not filed a responsive pleading to the Complaint.

¹ DLA Piper US LLP currently represents Plaintiffs and has filed this Motion for Default Judgment and Permanent Injunction while a Motion for Leave to Withdraw and Substitute Attorneys Pursuant to Local Rule 83.17 is pending.

4. Accordingly, Plaintiffs hereby move for default judgment against Defendant pursuant to Rule 55 of the Federal Rules of Civil Procedure.

5. Plaintiffs also request statutory damages pursuant to 17 U.S.C. § 504(c) in the amount of \$4,500.00, costs pursuant to 17 U.S.C. § 505 in the amount of \$550.00, and the requested permanent injunction as set forth more fully in the Memorandum in Support of Plaintiffs' Motion for Default Judgment and Permanent Injunction (the "Memorandum"), filed contemporaneously herewith.

WHEREFORE, for the reasons stated herein and in the Memorandum, Plaintiffs respectfully request that the Court enter an Order for (1) default judgment in favor of Plaintiffs and against Defendant; (2) statutory damages in the total amount of \$4,500.00; (3) an injunction in the form sought in the Complaint; (4) costs of \$550.00; and (5) for any other relief this Court deems appropriate under the circumstances.

Respectfully submitted,

LAFACE RECORDS LLC; UMG
RECORDINGS, INC.; and BMG MUSIC.

DATED: June 18, 2008

By: /s/ Ann Marie Bredin
One of their attorneys

Keith W. Medansky (ARDC #06195673)
Ann Marie Bredin (ARDC #06255663)
Amanda C. Jones (ARDC #06286509)

DLA PIPER US LLP
203 N. LaSalle Street Suite 1900
Chicago, Illinois 60601-1293
Telephone: (312) 368-4000
Facsimile: (312) 236-7516
E-mail: ann.bredin@dlapiper.com

Attorneys for Plaintiffs
(Motion for Leave to Withdraw and Substitute Attorneys pending)

Respectfully submitted,

LAFACE RECORDS LLC; UMG
RECORDINGS, INC.; and BMG MUSIC

DATED: June 18, 2008

By: /s/ Tia C. Ghattas
Tia C. Ghattas (ARDC # 6269818)

Tia C. Ghattas (ARDC # 6269818)
Cozen O'Connor
222 S. Riverside Drive
Suite 1500
Chicago, IL 60606-6000
Telephone: (312) 382-3116
Facsimile: (312) 706-9716
E-mail: tghattas@cozen.com
www.cozen.com

Proposed Attorneys for Plaintiffs
(Motion for Leave to Withdraw and Substitute Attorneys pending)